

REMARKS**I. General**

The Examiner is thanked for the indication that claims 1-13 are allowed.

Claims 1-15 are pending, and claims 14 and 15 are rejected by the Office Action mailed October 18, 2005. No claims are amended by this response. The issues in the current Office Action are as follows:

- Claims 14 and 15 are rejected under 35 U.S.C. § 102(b) as being anticipated by US 6,051,768 (hereinafter, *Masubuchi*).
- Claims 1-13 are allowed.

Applicant hereby traverses the rejections and requests reconsideration and withdrawal in light of the remarks contained herein.

II. Rejection under 35 U.S.C. § 102

Claims 14 and 15 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Masubuchi*. Applicant traverses the rejection.

It is well settled that to anticipate a claim, the reference must teach every element of the claim, see M.P.E.P. § 2131. Moreover, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, “[t]he elements must be arranged as required by the claim,” see M.P.E.P. § 2131, citing *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Furthermore, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim,” see M.P.E.P. § 2131, citing *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989). Applicant respectfully asserts that the rejection does not satisfy these requirements.

Claim 14 defines a button for engaging an electrical switch that comprises means for reducing lateral motion of the button. The element identified by the Examiner as corresponding to the claimed means, namely pendent portion 8, does not perform the claimed

function. The pendent portion 8 does not reduce lateral motion of the button; instead, the pendent portion limits the vertical movement of the key by contacting upper limit stopper 14 when the key is not depressed and contacting depressed key stopper 15 when the key is depressed, see column 4, lines 14-18. Thus, *Masubuchi* does not teach all of the claimed limitations.

In Response to Arguments, the Office Action asserts that the above-recited limitation is taught by the pendent portion of *Masubuchi* when given its broadest reasonable interpretation. It is respectfully asserted that, even given its broadest reasonable interpretation, such feature is not taught by *Masubuchi*. As noted above, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim,” see M.P.E.P. § 2131. The above-recited portion specifically recites “lateral motion.” However, *Masubuchi* teaches that the motion of the pendent portion 8 is limited between the upper limit stopper 14 and the depressed key stopper 15—two vertical limits to the motions. *Masubuchi* does not teach reducing lateral motion of the key, and, in fact, does not mention lateral motion at all. Accordingly, *Masubuchi* does not teach the invention in as complete detail as contained in the claim. Therefore, Applicant respectfully asserts that for at least the above reasons claim 14 is patentable over the 35 U.S.C. § 102 rejection of record.

Claim 15 defines a button for engaging an electrical switch that comprises means for reducing wobble of the button. The Office Action in Response to Arguments cites the pendent portion 8 of *Masubuchi* to teach this element. However, this element does not perform the claimed function. The pendent portion 8 does not reduce wobble; instead, the pendent portion limits the vertical movement of the key by contacting upper limit stopper 14 when the key is not depressed and contacting depressed key stopper 15 when the key is depressed, see column 4, lines 14-18. Thus, *Masubuchi* does not teach all of the claimed limitations.

In Response to Arguments, the Office Action asserts that the above-recited limitation is taught by the pendent portion of *Masubuchi* when given its broadest reasonable interpretation. It is respectfully asserted that, even given its broadest reasonable interpretation, such feature is not taught by *Masubuchi*. As noted above, in order for a prior

art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim,” see M.P.E.P. § 2131. The above-recited portion specifically recites “wobble.” However, *Masubuchi* teaches that the motion of the pendent portion 8 is limited between the upper limit stopper 14 and the depressed key stopper 15—two vertical limits to the motion. *Masubuchi* does not teach reducing wobble of the key, and, in fact, does not mention wobble at all. Accordingly, *Masubuchi* does not teach the invention in as complete detail as contained in the claim. Therefore, Applicant respectfully asserts that for at least the above reasons claim 15 is patentable over the 35 U.S.C. § 102 rejection of record.

III. Conclusion

In view of the above, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 200300331-1 from which the undersigned is authorized to draw.

Dated: January 18, 2006

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No. EV482724004US, in an envelope addressed to: MS Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Dated: January 18, 2006

Signature: 

Donna Forbit

Respectfully submitted,

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